

PLACES FOR EVERYONE JOINT COMMITTEE

Date: 20 JULY 2021

Subject: Places for Everyone Publication Plan 2021: A Joint Development Plan Document for 9 Greater Manchester Local Authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan)

Report of: Paul Dennett, GMCA Portfolio Lead Housing, Homelessness and Infrastructure

PURPOSE OF REPORT

To update members on the progress of Places for Everyone Publication Plan 2021: a Joint Development Plan Document for 9 Greater Manchester Local Authorities (Places for Everyone Publication Plan 2021).

RECOMMENDATIONS:

The Joint Committee is recommended to:

1. Agree that the Places for Everyone Publication Plan 2021 has substantially the same effect on the remaining 9 districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) as the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF 2020);
2. Note the supporting background documents;
3. Recommend the Places for Everyone Publication Plan 2021 and supporting background documents to the districts with the intention that the districts:
 - a. Approve the PfE: Publication Draft 2021, including strategic site allocations and Green Belt boundary amendments, and reference to the potential use of compulsory purchase powers to assist with site assembly, and the supporting background documents, for publication pursuant to Regulation 19 of the Town

- and Country Planning (Local Planning) (England) Regulations 2012 for an 8 week period for representations to begin not earlier than 9 August 2021;
- b. Delegate authority to the relevant officer, in consultation with the Executive Member for Housing and Regeneration, to approve the relevant Statement of Common Ground(s) required pursuant to the National Planning Policy Framework 2019;
 - c. Approve Submission of the Places for Everyone Publication Plan 2021 to the Secretary of State for examination following the period for representations
4. Agree the Timetable for the production of the Places for Everyone Publication Plan 2021 (paragraph 3.7)

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Equalities Implications:

The Places for Everyone Publication Plan 2021 is a statutory plan which seeks to contribute to the achievement of sustainable development, delivering economic, social and environmental benefits together in a mutually reinforcing way. It is informed by an Integrated Appraisal which includes an Equalities assessment.

Climate Change Impact Assessment and Mitigation Measures

The Places for Everyone Publication Plan 2021 will provide the strategic planning policy framework to support the nine districts to meet the Greater Manchester ambition to be carbon neutral by 2038.

Legal Considerations:

The legislative and constitutional requirements for the preparation of a joint Development Plan Document (DPD) in the Planning and Compulsory Purchase Act 2004 (“2004 Act”) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (“2012 Regulations”) have been complied with.

The joint DPD will be submitted to the Secretary of State for independent examination (s20 of the 2004 Act) along with the documents prescribed by Regulation 22 of the 2012 Regulations. Prior to submission to the Secretary of State, the joint DPD must be published and representations invited, pursuant to Regulation 19 and Regulation 20 of the 2012 Regulations.

If the joint DPD is not prepared in accordance with the 2004 Act and the 2012 Regulations, any subsequent attempt to adopt the plan would be susceptible to challenge.

Financial Consequences – Revenue:

The preparation and examination of the Places for Everyone Publication Plan 2021 generates a revenue cost for 9 local authorities. A substantial evidence base has been assembled to support the plan which has involved commissioning of specialist and independent experts. There are no current revenue implications. Following this consultation, the PfE plan will be submitted to the Secretary of State for examination. There will be further revenue costs associated with the examination process, including appointment of a Programme Officer(s) and the cost of the examination itself, including procurement of a venue, Planning Inspectors and legal advice. Further reports will be provided to the Joint Committee as appropriate.

Financial Consequences – Capital:

There are no capital consequences identified

BACKGROUND PAPERS:

[Report to AGMA Executive Board December 2020](#)

[Report to AGMA Executive Board February 2021](#)

1. INTRODUCTION

- 1.1 The “Future of GM” paper in 2019 set out Greater Manchester’s bold plans for the future in the face of uncertainty. Despite Covid 19 and the ongoing uncertainty about the UK’s future trading relationships, the bold and ambitious vision for the city-region remains unchanged, although the actions prioritised to achieve some of those ambitions will inevitably have to change. Greater Manchester’s ambition to continue to be - and further develop our position as - a global city-region, with strong and prosperous communities throughout as well as a thriving and productive economy remains. Without a clear, long term cohesive set of plans it becomes almost impossible to implement and deliver initiatives that will achieve this ambition.
- 1.2 Within this context, the need for a bold spatial plan to provide certainty and guide development, investment and infrastructure has never been stronger. Government has sent a very strong message that Covid-19 should not be a reason to delay either the preparation of statutory plans or the determination of planning applications through the publication of emergency guidance to enable local authorities to continue to exercise their planning functions in a Covid-19 compliant way.
- 1.3 Up until December 2020 a joint development plan document of the ten Greater Manchester local authorities was being prepared, Greater Manchester’s Plan for Jobs, Homes & the Environment (known as the “GMSF”). The GMSF 2020 had reached the Regulation 19 (Publication) stage of the process, however, the decision at Stockport Council’s meeting on 3 December to not submit the GMSF 2020 to the Secretary of State for independent examination following the consultation period, and

the subsequent resolution at its Cabinet meeting on 4 December not to publish the GMSF 2020 for consultation, in effect signalled the end of the GMSF as a joint plan of the 10.

- 1.4 S.28 (6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations apply where one authority withdraws from an agreement to prepare a joint DPD. Together they enable a joint plan to continue to progress in the event of one of the authorities withdrawing, provided that the plan has “substantially the same effect” on the remaining authorities as the original joint plan
- 1.5 Consequently, at its meeting on the 11th December 2020, members of the AGMA Executive Committee asked officers to report back on the implications and process of producing a joint DPD of the nine remaining Greater Manchester (GM) districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). One of the key issues that officers were asked to explore was the extent to which the joint Places for Everyone plan could take advantage of the provisions set out in paragraph 1.4 above and proceed to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 Publication stage rather than have to go back to an earlier (Regulation 18) informal stage of consultation.
- 1.6 The ‘Publication stage’ is a formal consultation on the draft joint DPD pursuant to Reg. 19 of the Local Planning Regulations. It is a statutory stage that provides an opportunity for organisations and individuals to submit their final views on the content of the plan. The decision to ‘Publish’ the draft joint DPD is an Executive decision for the participating local authorities.
- 1.7 Following consultation on the Publication Plan, the draft joint DPD and the representations made in the Publication stage are sent to the Secretary of State – this is called the ‘Submission stage’, pursuant to Reg. 22 of the Local Planning Regulations. Upon completion of the consultation on the Publication Plan in late 2021, a post-consultation report will be prepared and then the plan will be submitted

to the Secretary of State for Examination in early 2022. Submission requires approval of each of the nine Full Councils of the participating local authorities.

1.8 At the AGMA Executive Board meeting on 12 February 2021, a report was considered setting out the merits of continuing to produce a joint plan of the nine remaining GM districts, to be known as “Places for Everyone”.

1.9 The report highlighted that producing such a plan would enable those nine districts to continue to:

- progress the strategic policies in GMSF 2020, for example net zero carbon development, affordable housing and space and accessibility standards for new housing
- maximise the use of sustainable urban/brownfield land and limit the need for Green Belt to accommodate the development needs of the nine
- align with wider Greater Manchester strategies for transport and other infrastructure investment
- utilise the evidence base already commissioned and completed, minimising the cost of producing further evidence
- spread the cost jointly of the independent examination

1.10 At the meeting, it was noted that each district would be asked to approve the making of an agreement with each other to prepare a joint Development Plan Document. Subsequently, each of the 9 districts have gained approval to establish a Joint Committee and to delegate the formulation and preparation of a joint Development Plan Document to the Joint Committee.

2.0 DIFFERENCES BETWEEN PLACES FOR EVERYONE 2021 AND GMSF 2020

2.1 The text of the GMSF2020 has been revised following the withdrawal of Stockport. The Places for Everyone Publication Plan 2021 (PfE2021) is attached at

<https://www.greatermanchester-ca.gov.uk/placesforeveryone>

2.2 The revisions to the PfE2021 (as compared to GMSF 2020) fall into 5 broad categories:

(i) As a direct result of the withdrawal of Stockport Council from GMSF

Policies relating specifically to Stockport Council's area have been removed (e.g. strategic allocations). Housing and employment land requirements and supply have been recalculated to reflect the withdrawal of Stockport Council, the change in the Plan period and the outcome of Duty to Co-operate discussions with Stockport to date, as has the extent of the proposed release of Green Belt in the remaining nine districts. The plan period has been updated from 2020-2037 to 2021-2037; and references to 'Stockport' 'Greater Manchester', 'Greater Manchester Spatial Framework' and 'GMSF' have been deleted and/or replaced where appropriate.

Information presented in the Plan relates to the 9 participating boroughs where appropriate and possible to do so. In some instances (such as air quality), information cannot be disaggregated from the Greater Manchester level, or it is not appropriate to do so as it is referring to the wider Greater Manchester area, including Stockport. In these instances, it is legitimate to present the information for Greater Manchester.

(ii) As a direct result of changes to government policy since October 2020

Government published the revised methodology for calculating Local Housing Need (LHN) on 16 December 2020. The methodology for all of the Greater Manchester Authorities other than Manchester City Council was largely unchanged, however the new methodology resulted in a 35% uplift for the Manchester City Council area. The revised LHN methodology states that the 35% uplift is to be met within the district and not redistributed. As PfE 2021 has not been through the Publication Stage it is not subject to transitional arrangements and is required to take into account the standard methodology for calculating Local Housing Need published by Government on 16 December 2020. This resulted in the Manchester LHN increasing by

914 homes per annum or almost 15,000 homes over the plan period which has been reflected in Manchester City Council's housing land target in PfE 2021.

(iii) As a direct result of new evidence/information being made available since October 2020

The evidence base underpinning the Places for Everyone Publication Plan 2021 builds on that compiled for GMSF 2020. Addenda have been produced where appropriate to outline the additional work which has been undertaken to take account of the changes between GMSF 2020 and Places for Everyone Publication Plan 2021 and the passage of time.

(iv) Clarification of policy wording

This category includes minor changes to a limited number of policies as a result of ongoing collaboration with statutory consultees, and to provide more clarity regarding implementation.

(v) Minor typographical changes

This category relates to the correction of spelling and grammatical errors only.

3. ASSESSMENT OF THE PROPOSED CHANGES

3.1 The revisions set out in Section 2 have been reviewed in order to consider their impact on the effect of the PfE 2021 on the remaining nine authorities, compared to the GMSF 2020. The assessment of the effect of the changes is set out below.

(i) As a direct result of the withdrawal of Stockport Council from GMSF

The effect on the remaining nine districts of the removal of the Stockport allocations and associated references is minimal.

The withdrawal of the Stockport allocations did not result in the need for the remaining nine districts to amend the distribution of their objectively assessed housing and employment needs. Therefore the spatial strategy for the remaining nine districts will have substantially the same effect as the GMSF 2020 would have had on the nine remaining districts.

The withdrawal of Stockport in December delayed publication of the plan under Regulation 19. The PfE Plan period has therefore been revised to 2021 to 2037, from 2020 to 2037 (that of GMSF 2020). As a result, the overall (and individual) housing and employment land targets have been amended and the ability of the land supply to meet these revised targets has consequently altered. Whilst a small number of changes have been made to allocations in Oldham and Salford, as a result of this, the resultant spatial strategy will have substantially the same effect as the GMSF 2020 would have had on the nine remaining districts.

The proposed Green Belt release in PfE 2021 equates to 1,755 hectares, equating to 3.3% of the current Green Belt covering the 9 districts. GMSF 2020 proposed Green Belt release of 1940 hectares, which equated to a 3.3% reduction in the extent of the Greater Manchester (all 10 districts) Green Belt.

In light of the above, it is considered that the revisions which fall into this category (as a direct result of the withdrawal of Stockport) would result in a plan which has a substantially the same effect on the participating nine districts as GMSF 2020.

- (ii) **As a direct result of changes to government policy since October 2020**
A higher annualised plan figure for Manchester City than in the GMSF 2020 (2,951 vs 3527) has been introduced within PfE 2021 as a result of the revised LHN. Through this process Manchester City Council has identified sufficient land in the urban area to meet its increased need and consequently

remove a very small Green Belt housing site. This remains consistent with the GMSF 2020 spatial strategy which concentrated growth in the centre of the conurbation. Manchester City's increased LHN, and therefore its PfE 2021 housing target, helps to maintain a consistent spatial strategy, between the two plans, despite Stockport's withdrawal. and results in a Plan with substantially the same effect as the GMSF 2020 on the nine districts.

(iii) As a direct result of new evidence/information being made available since October 2020

The types of changes outlined in section 2.1(iii) above, which fall into this category have arisen out of the need to maintain an up-to-date evidence base, despite the passage of time since the GMSF 2020 and similarly the need to have continuous dialogue with key stakeholders on matters of strategic importance. The effect of the proposed amendments on the overall strategy and objectives of the plan have substantially the same effects on the participating nine districts as GMSF 2020.

(iv) Clarification of policy wording

Minor changes to policies, referred to in section 2.1(iv) above, have been made to assist interpretation of the policies. It is not considered that they impact on the overall objectives of the policies or specific allocations. Therefore, the effect of the policies on the remaining nine districts remains substantially the same as they did in GMSF 2020. However, they make the plan less ambiguous, in line with NPPF.

(vi) Minor typographical changes.

This category relates to the correction of spelling and grammatical errors only and therefore result in a plan which has a substantially the same effect on the participating districts as GMSF 2020.

3.2 Having considered the impact of the five different categories of changes above, it is necessary to consider if their cumulative impact would result in a plan which has a

substantially the same effect on the participating nine districts as GMSF 2020. In this context, it is important to note that, as with the above assessment, “substantially the same effect” does not mean “the same effect”. It allows for flexibility to address the fact that the plan now covers a different geographical area, with consequently different levels of needs and resulting changes to allocations.

- 3.3 The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change. However, in determining the cumulative impact of these multiple changes, it is important to consider what impact they have had on the overall Vision, Objectives and Spatial Strategy of PfE 2021 compared to GMSF 2020, particularly for the decision maker in implementation terms.
- 3.4 As set out above, the resultant impact of the changes on the overall strategy of the joint plan and its effect on the remaining nine districts is limited.
- 3.5 On this basis, officers have concluded that the PfE2021 has substantially the same effect on the 9 boroughs as the GMSF 2020 and recommend that the plan proceed to a Publication stage (Regulation 19) consultation.
- 3.6 Leading Counsel has provided a note (Appendix 1) confirming the relevant statutory provisions and endorsing the approach and conclusions of officers that the plan has substantially the same effect.
- 3.7 On this basis the timetable for preparation of the PfE 2021 plan is:
- Publication Plan (Regulation 19) – period for representations August – October 2021
 - Submission (Regulation 22) – January 2022
 - Examination- 2022/23
 - Adoption - 2023

4 PLACES FOR EVERYONE PUBLICATION PLAN 2021

4.1 The PfE2021 provides an important opportunity to create the conditions for inclusive economic growth, provide opportunities for provision of much needed homes, protect, and enhance the natural environment. The Plan is not being prepared in isolation. It is supported by the Transport 2040 Delivery Plan, which will outline the interventions required to achieve the transport vision for the city region and is one of a suite of strategic documents setting out how Greater Manchester can achieve the ambition set out in the Greater Manchester Strategy. It sits alongside the Local Industrial Strategy, Housing Strategy, 5 Year Environment Plan, Digital and Cultural Strategies.

4.2 This is our plan for sustainable growth in the 9 boroughs, it;

- sets out how they should develop up to the year 2037,
- identifies the amount of new development that will come forward in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused,
- identifies the important environmental assets which will be protected and enhanced,
- allocates sites for employment and housing required outside of the urban area,
- supports the delivery of key infrastructure, such as transport and utilities,
- defines a new Green Belt boundary for the 9 boroughs.

4.3 Our vision is for a Greater Manchester which emerges from the pandemic a more resilient and better city-region. The impact of Covid 19 on people's lives and wellbeing as well on our economy and communities is not yet known but will be severe. There is an opportunity to capture some of the changes, for example the on the increase in cycling and walking and the acceleration in flexible working that we have seen over the recent months, and harness this to cement the benefits for our towns and cities. Greater Manchester needs to be a place where all of our people can access the services they require through high quality digital communications and where our town and city centres can respond to the decline in their traditional retail

role in positive ways. One of the biggest lessons of the pandemic is the importance of good quality greenspace close to where people live. This is particularly important in our densely populated and deprived neighbourhoods.

Spatial Strategy

4.4 The spatial strategy seeks to deliver sustainable, inclusive growth with the following spatial elements;

- Significant growth in jobs and housing at the core – continuing development in the ‘core growth area’ encompassing the city centre and beyond to the Etihad in the east, through to the Quays, Trafford Park and Port Salford in the west. The majority of commercial employment growth is proposed in this area and around 50% of overall housing supply is found here and, in the wards, immediately surrounding it (inner areas).
- Boosting the competitiveness of the northern districts – provision of significant new employment opportunities and supporting infrastructure and a commitment that collectively the northern districts meet their own local housing need
- Sustaining the competitiveness of the southern districts – supporting key economic drivers, for example around Wythenshawe hospital and the Airport, realising the opportunities offered by national infrastructure investment, e.g. HS2, whilst recognising the important green infrastructure assets in the area.

Jobs

4.5 Economic prosperity is central to the overall strategy. It is essential to raising incomes, improving health and quality of life, and providing the finances to deliver better infrastructure, services and facilities. In the face of the uncertainty wrought by Covid 19, we know that we need to continue to invest in our city and town centres to drive our recovery. We need to continue to develop our Research and Development capabilities underpinned by our excellent academic institutions as well as investing in strengthening existing, and creating new, employment locations so that all communities are able to contribute to, and benefit from, growth.

- 4.6 The Greater Manchester Independent Prosperity Review: One Year On 2020 indicated that Greater Manchester was the most economically diverse city region economy with world-class strengths in advanced materials and health innovation. Yet the Prosperity Review also acknowledged that for two decades Greater Manchester's productivity consistently remained at 90% of UK level and a year on this gap persists.
- 4.7 There is a growing body of evidence that the worst effects of the COVID-19 pandemic have amplified pre-existing patterns of not only health, but also economic inequality. This gap is linked to economic inequality with overall pay levels and salary growth in Greater Manchester lagging behind UK averages. The growth in employment in low productivity sectors witnessed in Greater Manchester over the last decade further explains this, as these sectors are likely to pay lower wages and invest in lower value business models which perpetuate the challenges. Furthermore, it is in these sectors of the foundational economy (retail, hospitality and leisure) in which employees have tended to be hardest hit during the COVID-19 crisis.
- 4.8 Growing inequalities have a major impact on quality of life for Greater Manchester residents such as the ability to afford decent housing, good quality food and services. As emergency support schemes from government are withdrawn, a greater focus is needed to support businesses in the foundational economy in a Greater Manchester has the opportunity to lead with the 'levelling up' agenda helping to deliver a more successful North of England and aiding the long-term economic success of the country as a whole. This Plan supports high levels of economic growth across Greater Manchester and seeks to put in place the measures that will enable such growth to continue in the even longer-term. However, delivering these high levels of growth means that Greater Manchester will need to continue to invest in the sites and critical infrastructure that will make it an even more attractive place for businesses to invest, bringing high-value, well paid jobs, to the city region; invest in skills and business development to support the foundational economy, and promote the continued progress towards a low-carbon economy.

4.9 In pursuit of this, the plan sets a target for the nine districts of at least 1,900,000 sq.m. of new office floorspace and at least 3,330,000 sq.m. of industrial and warehousing floorspace over the plan period.

Homes

4.10 Greater Manchester is facing a housing crisis and the impact of Covid 19, with potential increases in unemployment will exacerbate this. Although the Greater Manchester authorities have built more houses in recent years, wages have not been keeping pace with property price increases and affordability issues have intensified. To address the supply side Government has introduced a standard methodology for calculating local housing needs to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area. The construction of new housing is also an important part of the economy, providing large numbers of jobs and often securing the redevelopment of derelict and underused sites.

4.11 Applying the current methodology means that around 10,300 (10,305) homes are required in per annum, equating to just under 165,000 (164,880) new homes over the plan period. The plan supports Greater Manchester's commitment to deliver more affordable housing - 50,000 units over the plan period, including 30,000 for social or affordable rent.

Environment

4.12 The Plan is not solely concerned with accommodating development. It also includes a range of policies designed to protect and enhance our many and varied green spaces and features which are used in many different ways and afforded many different values by the people who live, work or visit the city-region.

4.13 The Plan supports the important role of our natural assets by:

- Taking a landscape scale approach to nature restoration ;
- Seeking to protect and enhance our network of green and blue infrastructure;

- Seeking a significant overall enhancement of biodiversity and geodiversity; and
- Seeking to maintain a new and defensible Green Belt which will endure beyond the plan period.

4.14 Furthermore, the plan supports wider strategies around clean air, walking and cycling and underpins Greater Manchester's ambition to be a carbon neutral city-region by 2038. A key element of this is to require all new development to be net zero carbon by 2028 and to keep fossil fuels in the ground.

Brownfield land preference

4.15 There is a strong focus in the plan on directing new development towards sites within the existing urban area, which are often in sustainable locations, close to facilities and served by existing infrastructure. Maximising the use of land in the urban area reduces the need to release greenfield and Green Belt land for development.

4.16 The land supply identified for development in the plan is largely within the urban area:

- Offices - 99%
- Industry and Warehousing- 47%
- Housing - 90%

4.17 There are significant viability issues in parts of the conurbation and there is a need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. The recently announced Brownfield Housing Fund is targeted at Combined Authorities and begins to help to address viability issues, but it is not enough to enable the full potential of our brownfield land supply to be realised.

Green Belt

4.18 The PfE 2021 Plan proposes a limited release of a Green Belt for both housing and employment. The net loss of Green Belt proposed is 1,754 hectares. This represents

a significant reduction from the 4,371 hectares which were proposed for release by the nine PfE districts in the 2016 GMSF. This has been achieved through:

- Removing a number of sites
- Reducing the extent of Green Belt release within sites and retaining more Green Belt within some sites
- Proposing a limited number of Green Belt additions

The proposals in the Plan would result in the overall extent of the nine PfE districts Green Belt reducing by 3.3%. The current Green Belt covers almost 47% of the land covered by the nine PfE districts the proposals in this Plan would reduce this by just under 2% with over 45% (45.2%) of the PfE Plan remaining as designated Green Belt.

5. RELATIONSHIP WITH DISTRICT LOCAL PLANS

5.1 PfE2021 is key to create the foundations for the scale of growth and ambition across our boroughs. It will be part of the Development Plan for each participating local authority, but it is a high level, strategic plan and does not cover everything that a district local plan would. Appendix 2 sets out the policies in local plans which will be replaced by the PfE2021. Local plans will continue to be important to take forward the PfE2021 strategic policies and interpret these at a more detailed local level to support the creation of locally distinctive high quality places/neighbourhoods. Following adoption of the PfE2021, each district will be updating their own local plans.

6. INTEGRATED ASSESSMENT AND HABITATS REGULATIONS ASSESSMENT

6.1 As part of the development of the GMSF 2020, an Integrated Assessment (IA) was undertaken incorporating the requirements of:

- Sustainability Appraisal (SA): mandatory under section 19 (5) of the Planning and Compulsory Purchase Act 2004.
- Strategic Environmental Assessment (SEA): mandatory under the Environmental Assessment of Plans and Programmes Regulations 2004 (which transpose the European Directive 2001/42/EC into English law).

- Equality Impact Assessment (EqIA): required to be undertaken for plans, policies and strategies by the Equality Act 2010.
- Health Impact Assessment (HIA): there is no statutory requirement to undertake HIA, however it has been included to add value and depth to the assessment process.

6.2 The IA contributed to the development of the GMSF through an iterative assessment, which reviews the draft policies and the discrete site allocations against the IA framework.

6.3 Given the conclusion in section 3 that PfE 2021 has substantially the same effect as the GMSF 2020 would have had on the nine districts enabling the application of S.28(6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations, it follows that PfE should be considered as, in effect, the same Plan as the GMSF, albeit without one of the districts (Stockport). Therefore “the plan” which is being assessed is one and the same. Its content has changed over time through the iterative process of plan making, but its purpose has not. In view of this, the environmental assessments carried out at previous stages remain valid (including their scope). That said, addendum reports have been prepared to assess the impact of the changes between GMSF 2020 and PfE 2021 against the IA framework and these are available alongside the GMSF 2020 IA documentation.

6.4 A Habitats Regulations Assessment (HRA) refers to several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.

6.5 All plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have significant effects

on that site. If a proposed plan or project is considered likely to have a significant effect on a protected habitats site (either individually or in combination with other plans or projects) then an Appropriate Assessment of the implications for the site is required.

- 6.6 As was the case with GMSF, PfE2021 is regarded as a Plan which is considered likely to have significant effect on one or more European protected site and has therefore been informed by an HRA with mitigation measures identified as appropriate.

7. EVIDENCE BASE

- 7.1 A comprehensive evidence base was assembled to support the policies and proposals in the GMSF 2020. This evidence base remains the fundamental basis for the PfE 2021 and has remained available on the GMCA's website since October 2020. This evidence base has been reviewed and updated in the light of the change to the PfE2021 and, where appropriate addendum reports have been produced. The evidence documents which have informed the plan are available on the website, in advance of the formal consultation starting.
- 7.2 One key supporting document is the Statement of Common Ground. This will set out the key matters between the 9 authorities agreeing on the distribution and quantum of development contained in the Publication Plan. There may be a need for additional Statements of Common Ground to deal with specific matters linked to the proposed site allocations and these will be the responsibility of the relevant local authority to draw up if required.
- 7.3 It will also deal with any matters with other organisations, including Stockport as one of our neighbouring local authorities, that need to be agreed to enable the Plan to be submitted next year. The position between Stockport and the remaining 9 Greater Manchester authorities has evolved from December 2020 when all 10 were co-operating on the Greater Manchester Spatial Framework, to the more recent position

where, in March 2021, the 9 remaining local authorities agreed to produce a joint plan (Places for Everyone) following the Stockport decision to withdraw from the joint plan to prepare its own local plan.

7.4 In the light of this it has been necessary to 'reset' the Duty to Co-operate arrangements. The outcome of the GMSF work was an agreed approach to the scale and distribution of development and a number of housing and employment allocations to ensure that the overall Vision and Objectives of the Plan were met. Whilst the outcome of the spatial strategy was some individual districts not meeting their LHN and some exceeding theirs, the extent to which districts were meeting need was never a defining factor in determining distribution. No district was identified as having 'unmet' needs as overall Greater Manchester was meeting its collective LHN and supporting the spatial strategy. At this point in time, the 9 districts do not have an understanding of what the Stockport land supply position is, and the assumptions underpinning Stockport's assessment of it and until this assessment is carried out it is too early to be able to have conclusive discussions on potential distribution of development needs. Duty to co-operate discussions with Stockport continue

7.5 The PfE2021 supporting documents can be found at (<https://greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/supporting-documents/>)

7.6 This website will be updated following the district approval process and the consultation portal (GMConsult.org) will become live at the start of the formal consultation.

8. PREVIOUS CONSULTATION

8.1 Four consultations have taken place in relation to the GMSF. The first, in November 2014 was on the scope of the plan and the initial evidence base, the second in November 2015, was on the vision, strategy and strategic growth options, and the third, on a Draft Plan in October 2016.

- 8.2 The fourth and most recent consultation on The Greater Manchester Plan for Homes, Jobs and the Environment: the Greater Manchester Spatial Framework Revised Draft 2019 (GMSF 2019) took place in 2019. It received over 17,000 responses. The responses received informed the production of GMSF 2020. The withdrawal of Stockport Council in December 2020 prevented GMSF 2020 proceeding to Regulation 19 Publication stage and instead work was undertaken to prepare PfE 2021.
- 8.3 Where a local planning authority withdraws from a joint plan and that plan continues to have substantially the same effect as the original joint plan on the remaining authorities, s28(7) of the Planning and Compulsory Purchase Act 2004 provides that any step taken in relation to the plan must be treated as a step taken by the remaining authorities for the purposes of the joint plan. On this basis, it is proposed to proceed directly to Publication stage under Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.
- 8.4 At this stage, whilst anyone can make a representation on any point, only those pertaining to 'soundness' will be taken into account by the Inspector(s). The term 'sound' is used to describe a Local Plan that has been prepared in accordance with what Government expects of local planning authorities. As set out in paragraph 35 of the National Planning Policy Framework, plans are sound if they are;
- (a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs 19 ; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - (b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - (c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

(d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

8.5 Inspectors also consider submissions concerning legal compliance issues, for example the Integrated Assessment, the Habitats Assessment Regulation and the Duty to Co-operate.

9. COMMS AND ENGAGEMENT PLAN

9.1 The consultation will be carried out in line with the requirements of the district Statements of Community Involvement.

9.2 There is a detailed Comms, Engagement and Media plan that has been prepared to support this plan, its overarching aims are to -

- Position the consultation as a final opportunity to review the plan and the further detail and evidence ahead of it being submitted to Government in 2022
- Give all stakeholders the opportunity to review the document and supporting information in ways that are right for them
- Provide partners, including peers in districts, with the tools, messages and information they need to support local communication and engagement activity in their own borough
- Ensure the process to engage is inclusive of the different diverse groups across the city region
- Ensure all stakeholders, including the Mayor, the strategic lead for housing, homelessness and infrastructure and wider political stakeholders, are clear on the purpose of the consultation and communicate this to their own audiences
- Provide alternative and innovate ways of sharing the plan at a time when face to face engagement might not be appropriate.

9.3 Effective community and stakeholder engagement will be promoted by means which are reasonably practicable. Government guidance strongly encourages the use of online engagement methods. Greater Manchester Communications and Engagement team have developed several strategies to support this. These will be supplemented

by plans that are being prepared by the districts which consider the use of the following;

- virtual exhibitions,
- digital consultations,
- video conferencing,
- social media and online chat functions

9.4 Reasonable steps need to be taken to ensure sections of the community that don't have internet access are involved and consider alternative and creative ways to achieve this. This could include;

- engaging sections of the community, that do not have internet access, through representative groups rather than directly;
- using existing networks such as GM Equality groups or the VCSE sector;
- allowing individuals to nominate an advocate to share views on their behalf;
- Providing telephone information lines;
- Providing timed face-to-face information sessions for community representatives (maintaining social distancing as appropriate).

9.5 Given the ongoing uncertainty, around the type of social distancing restrictions which may be in place at the time the consultation, different scenarios are being developed to respond to different levels of social distancing/public interaction which may be possible.

9.6 The planning legislation and guidance requires the plan to be justified by a detailed evidence base. Many of these documents are complex technical documents, and it is appreciated that they may be difficult to understand. All reasonable efforts will be made to ensure that documents comply with the Accessibility guidance as far as possible. Additionally a range of Topic Papers has been produced which explain the evidence and how it has informed the policies in the plan, enabling the reader to more easily understand the extensive evidence base.

- 9.7 We have been continually learning from consultation and communication activity, both relating to strategic plan development, and successfully carrying out these activities during a pandemic.
- 9.8 A detailed Comms, Engagement and Media plan is being developed which aims to learn from the past and mitigate any risks there might be which would prevent people from being aware of or engaging in this stage of the plan.

10. NEXT STEPS

- 10.1 Following consultation on the Publication Plan, the draft joint DPD and the representations made in the Publication stage are sent to the Secretary of State – this is called the ‘Submission stage’, pursuant to Reg. 22 of the Local Planning Regulations. Upon completion of the consultation on the Publication Plan in late 2021, a post-consultation report will be prepared and then the plan will be submitted to the Secretary of State for Examination in early 2022. Submission requires approval of each of the nine Full Councils of the participating local authorities. Whilst anyone can make a representation on any point, only those pertaining to the 4 tests of soundness will be taken into account by the Inspector(s). If major new issues arise at the Publication Consultation stage there would need to be further consultation prior to any submission of the plan.
- 10.2 An Examination in Public takes place at which a Planning Inspector will consider the joint DPD and representations made in respect of it and determine whether the DPD is capable of being adopted, either with or without amendments.
- 10.3 Assuming that the document is capable of adoption, whether with or without amendments, the ultimate decision to adopt must be taken by each of the Full Councils of the 9 participating local authorities

11. RECOMMENDATIONS

11.1 Recommendations are found at the front of the report

Places for Everyone Publication Plan 2021 & Regulation 32

OPINION

1. I am instructed by 9 Greater Manchester Authorities¹ to consider whether (a) the Places for Everyone [“PfE 2021”] Publication Plan 2021 draft joint development plan document “has substantially the same effect” “with respect to the areas of” these 9 authorities which have prepared it, as (b) Greater Manchester’s Plan for Jobs, Homes & the Environment [“GMSF 2020”] Publication Plan 2020 did.
2. GMSF 2020 was prepared by the 9 PfE 2021 authorities *and* Stockport Council as their joint plan (a plan for the 10) however subsequently Stockport withdrew from the agreement to prepare a joint plan. The remaining 9 authorities have prepared PfE 2021 as their joint plan (a plan for the 9).
3. GMSF 2020 had reached the stage of publication under Regulation 19 of the 2012 Local Plan Regulations². The combined effect of Section 28 of the Planning and Compulsory Purchase Act 2004 and Regulation 32(2) of the 2012 Local Plan Regulations is that if PfE 2021 “has substantially the same effect” “with respect to the areas of”³ the 9 remaining authorities as GMSF 2020 did for the areas of these 9 authorities *then* PfE 2021 can proceed to publication under Regulation 19 without having to go back to an earlier stage in the process.
4. In my opinion, the word “substantially” in this context should be given its ordinary meaning of “for the most part” “essentially”⁴ or to put it more colloquially *by and large*.
5. The report to the PfE Joint Committee scheduled for 20th July 2021 analyses the differences between PfE 2021 and GMSF 2020 and explains that they arise for one or other of five main reasons, namely:
 - 1) As a direct result of the withdrawal of Stockport Council from the process;
 - 2) As a direct result of changes to government policy;
 - 3) As a direct result of new evidence / information;
 - 4) As clarifications of wording, and

¹ Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan

² The Town and Country Planning (Local Planning) (England) Regulations 2012

³ To quote from Regulation 32(2)

⁴ OED

- 5) As corrections of typographical errors.
6. The report elaborates and discusses each category of change before concluding that PfE 2021 has substantially the same effect as GMSF 2020 with respect to the areas of the 9 authorities in question.
 7. I have considered the report and the conclusion it reaches in this regard, and I have been able to compare PfE 2021 with GMSF 2020 for myself assisted by the officers' analysis.
 8. Two points arise. *First*, in the event that the Joint Committee agrees with the officers' conclusion (that PfE 2021 has substantially the same effect as GMSF 2020 with respect to the areas of the 9 remaining authorities) would this conclusion be vulnerable to a legal challenge by judicial review on the basis that it is unreasonable? I put the question in that way because whether the two plans have substantially the same effect is a judgment-call for the Joint Committee, not for the courts. Instead, in the event of a legal challenge the court would consider whether the Joint Committee's conclusion is perverse in the sense of being so unreasonable that no reasonable authority could have reached that conclusion. Put another way, was the conclusion legally open to the Joint Committee. As can be seen from the nature of the concept, this is a high hurdle for any would-be challenger to surmount.
 9. In my opinion, it is entirely open to the Joint Committee to agree with the officers' conclusion on the basis of the reasoning set out by the officers in the report. I fail to see how any such conclusion could be held to be unreasonable in the sense just explained. In other words, if the Joint Committee wishes to agree with the officers, it should feel itself legally free and able to do so.
 10. *Secondly*, in my opinion, not only is the conclusion reached by officers one which it would be lawful for the Joint Committee to agree with, it is also the correct conclusion to reach. PfE 2021 does have substantially (as in for the most part, essentially, by and large) the same effect for the areas of the remaining 9 authorities as the GMSF 2020 did for their areas. I agree with the officers' reasoning.

Christopher Katkowski QC
7th July 2021

Kings Chambers

Replaced District Local Plan Policies

- A.1** Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012 explains that ‘where a Local Plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.’
- A.2** Upon adoption of this Plan a number of policies in district local plans will be partially replaced by policies in this Plan (see tables below). Any part of the policy which is not replaced will be retained and will remain part of the respective statutory development plan.

Bolton Council

Table A.1 Replaced Bolton Local Plan Policies

Policy	Replaced by PFE policy/policies
H1 Healthy Bolton	JP-P6
A1 Achieving Bolton	JP-P5
P1 Employment land	JP-J2, JP-J3 and JP-J4
P3.1 Waste hierarchy	JP-S7
P5.1 Accessibility by different types of transport	JP-C1
P5.2 Accessibility by public transport	JP-C3
P5.3 Freight movement	JP-C6
P5.4 Servicing arrangements	JP-C7
P5.6 Transport needs of people with disabilities	JP-C4
P5.7 Transport assessments and travel plans	JP-C7
S1 Safe Bolton	JP-C7 and JP-P1
CG1.1 Green infrastructure in rural areas	JP-G1, JP-G2, JP-G3, JP-G4, JP-G5 and JP-G7

CG1.2 Urban Biodiversity	JP-G2
CG1.3 Open space	JP-G6
CG1.5 Flooding	JP-S5
CGH1.6 Energy requirements	JP-S2
CG1.7 Renewable energy	JP-S2
CG2 except CG2.2(c) Sustainable development	JP-S2
CG3 Built environment	JP-S4, JP-G1, JP-P1 and 2
SC1.1 Housing requirement	JP-H1
SC1.5 Housing Density	JP-H4

Bury Council

Table A.2 Replaced Bury Local Plan Policies

Policy	Replaced by PFE policy/policies
EC1 Employment Land Provision	JP-J1
EC2 Existing Industrial Areas and Premises	JP-J2 and JP-J4
EC3 Improvement of Older Industrial Areas and Premises	JP-J2
EC3/1 Measures to Improve Industrial Areas	JP-J2
EC5 Offices	JP-J3
H1 Housing Land Provision	JP-H1
H2 Housing Environment and Design	JP-H3
H4 Housing Need	JP-H3
EN1 Environment	JP-P1
EN1/1 Visual Amenity	JP-P1
EN1/3 Landscaping Provision	JP-P1
EN1/11 Public Utility Infrastructure	JP-P1
EN2 Conservation and Listed Buildings	JP-P2
EN4 Energy Conservation	JP-S2 and JP-S3
EN4/1 Renewable Energy	JP-S2 and JP-S3
EN4/2 Energy Efficiency	JP-S2 and JP-S3

EN5 Flood Protection and Defence	JP-S5
EN5/1 New Development and Flood Risk	JP-S5
EN6 Conservation of the Natural Environment	JP-G9
EN6/5 Sites of Geological Interest	JP-G9
EN7 Pollution Control	JP-P1
EN7/1 Atmospheric Pollution	JP-S6
EN8 Woodland and Trees	JP-G7
EN9 Landscape	JP-G1
EN9/1 Special Landscape Area	JP-G1
OL1 Green Belt	JP-G10
OL1/1 Designation of Green Belt	JP-G10
OL3 Urban Open Space	JP-G6
OL3/1 Protection of Urban Open Space	JP-G6
OL5 River Valleys	JP-G3
RT2 New Provision for Recreation in the Urban Area	JP-P7
RT2/3 Education Recreation Facilities	JP-P7
RT2/4 Dual-Use of Education Facilities	JP-P7
RT3 Recreation In The Countryside	JP-G3, JP-G2 and JP-G5
HT1 A Balanced Transportation Strategy	JP-C1, JP-P1 and JP-C4
HT2/6 – Replacement Car Parking	JP-C7
HT2/10 – Development Affecting Trunk Roads	JP-C7
HT3 Public Transport	JP-C1 and JP-C3
HT4 New Development	JP-C7
HT6 Pedestrians and Cyclists	JP-C1, JP-C4 and JP-C5
HT6/2 – Pedestrian/Vehicular Conflict	JP-C4 and JP-C5
HT7 Freight	JP-C6
CF1 Proposals for New and Improved Community Facilities	JP-P1 and JP-P3
CF2 Education Land and Buildings	JP-P5

CF4 Healthcare Facilities	JP-P6
CF5 Childcare Facilities	JP-P5
MW1 Protection Of Mineral Resources	JP-S7
MW2 Environmental Considerations For Mineral Workings	JP-S7
MW3 Waste Disposal Facilities	JP-S7
MW3/1 Derelict or Degraded Land (Waste)	JP-S7
MW3/2 Waste Recycling and Bulk Reduction	JP-S7

Manchester City Council

Table A.3 Replaced Manchester Local Plan Policies

Policy	Replaced by PFE policy/policies
SP1 Spatial Principles (Partially)	JP-S1
EC1 Employment and Economic Growth in Manchester (Partially)	JP-J3 and JP-J4
H1 Overall Housing Provision (Partially)	JP-H1
H2 Strategic Housing Location (Partially)	JP-S1, JP-S2 and JP-S5
H8 Affordable Housing (Partially)	JP-H2
T1 Sustainable Transport (Partially)	JP-C1
EN3 Heritage (Partially)	JP-P2
EN4 Reducing CO2 Emissions by Enabling Low and Zero Carbon Development (Partially)	JP-S2
EN6 Target Framework for CO2 Reductions from Low or Zero Carbon Energy Supplies (Partially)	JP-S2
EN8 Adaption to Climate Change (Partially)	JP-S2 and JP-S4
EN14 Flood Risk (Partially)	JP-G9
EN15 Biodiversity and Geological Conservation (Partially)	JP-G9
EN16 Air Quality (Partially)	JP-S6
EN17 Water Quality (Partially)	JP-S5

Oldham Council

Table A.4 Replaced Oldham Local Plan Policies

Policy	Replaced by PFE policy/policies
3 An Address of Choice (Partially)	JP-H1
4 Promoting Sustainable Regeneration and Prosperity (Partially)	JP-J3 and JP-J4
5 Promoting Accessibility and Sustainable Transport Modes (Partially)	JP-C3, JP-C4, JP-C5 and JP-C7
18 Energy (Partially)	JP-S2
19 Flooding (Partially)	JP-S5
20 Design	JP-P1
22 Protecting Open Land (Partially)	JPA12, JPA14, JPA15, JPA16 and JP-G10
25 Developer Contributions	JP-D2
UDP Policy B1.1.24 Royton Moss, Moss Lane, Royton	JPA14
UDP Policy H1.2.17 Housing Land Release Phase II	JPA17
UDP Policy OE1.8 Major Developed Site in the Green Belt	JPA15

Rochdale Council

Table A.5 Replaced Rochdale Local Plan Policies

Policy	Replaced by PFE policy/policies
E2 Increasing jobs and prosperity (Partially)	JP-J3 and JP-J4
E4 Managing the release of land to meet future employment needs	JP-J1, JP-J2, JP-J3 and JP-J4
C1 Delivering the right amount of housing in the right places (Partially)	JP-H1
G1 Tackling and adapting to climate change	JP-S1, JP-S2 and JP-S3
G2 Energy and new development	JP-S1, JP-S2 and JP-S3
G3 Renewable and low carbon energy developments (Partially)	JP-S1, JP-S2 and JP-S3
G4 Protecting Green Belt land	JP-G10

G5 Managing protected open land (Partially)	JP-G10
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Salford Council

Table A.6 Replaced Salford Local Plan Policies

Policy	Replaced by PFE policy/policies
ST1 Sustainable Urban Neighbourhoods	JP-S1
ST3 Employment Supply	JP-J1, JP-J3 and JP-J4
ST5 Transport Networks	JP-C1, JP-C3, JP-C4, JP-C5, JP-C6 and JP-C7
ST12 Development Density	JP-H4
ST13 Natural Environment Assets	JP-G1, JP-G2, JP-G3, JP-G4, JP-G6, JP-G7, JP-G8, JP-G9 and JP-G10
ST14 Global Environment	JP-S2
ST15 Historic Environment	JP-P2
EN1 Development Affecting the Green Belt	JP-G10

Tameside Council

Table A.7 Replaced Tameside Local Plan Policies

Policy	Replaced by PFE policy/policies
H1 Housing Land Provision (Partially)	JP-H1
H7 Mixed Use and Density (Partially)	JP-H4
OL1 Protection of the Green Belt	JP-G10
OL2 Existing Buildings in the Green Belt	JP-G10
OL3 Major Developed Sites in the Green Belt	JP-G10
T7 Cycling (Partially)	JP-C5 and JP-C7
T8 Walking (Partially)	JP-C5 and JP-C7
MW14 Air Quality (Partially)	JP-S6
U4 Flood Prevention (Partially)	JP-S5

Trafford Council

Table A.8 Replaced Trafford Local Plan Policies

Policy	Replaced by PFE policy/policies
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SL1 Pomona Island (Partially)	JP-S5
SL2 Trafford Wharfside (Partially)	JP-S1 and JP-S3
SL5 Carrington (Partially)	JP-S9, JP-S11 and JPA33
L1 Land For New Homes (Partially)	JP-H1 and JP-H4
L2 Meeting Housing Needs (Partially)	JP-H2 and JP-H3
L3 Regeneration and Reducing Inequalities (Partially)	JP-S5 and JP-S11
L4 Sustainable Transport and Accessibility (Partially)	JP-S14, JP-C1, JP-C3, JP-C4, JP-C5, JP-C6 and JP-C7
L5 Climate Change (Partially)	JP-S2, JP-S3, JP-S5 and JP-S6
L6 Waste (Partially)	JP-S7
L7 Design (Partially)	JP-P1
L8 Planning Obligations (Partially)	JP-D1 and JP-D2
W1 Economy (Partially)	JP-S9, JP-J1, JP-J2, JP-J3 and JP-J4
W2 Town Centres and Retail (Partially)	JP-S9, JP-S12 and JP-P4
W3 Minerals (Partially)	JP-S7
R1 Historic Environment (Partially)	JP-P2
R2 Natural Environment (Partially)	JP-S13, JP-G1, JP-G3, JP-G4, JP-G7, JP-G9 and JP-G10
R3 Green Infrastructure (Partially)	JP-S13, JP-G2, JP-G3, JP-G4, JP-G7 and JP-G9
R4 Green Belt, Countryside and Other Protected Open Land (Partially)	JP-S9, JP-S10, JP-S11, JP-G11, JP-G12, JPA3.2 and JPA33
R5 Open Space, Sport and Recreation (Partially)	JP-G6 and JP-P7
R6 Culture and Tourism (Partially)	JP-P3

Wigan Council

Table A.9 Replaced Wigan Local Plan Policies

Policy	Replaced by PFE policy/policies
SD1 Presumption in Favour of Sustainable Development	JP-S1
CP1 Health and Wellbeing	JP-P6
CP4 Education and Learning	JP-P5

CP5 Economy and Environment	JP-J1 and JP-J2
CP6 Housing (Clause 1 only)	JP-H1
CP8 Green Belt and Safeguarded Land	JP-G10 and JP-G11
CP9 Landscape and Green Infrastructure	JP-G1 and JP-G2
CP12 Wildlife Habitats and Species	JP-G9
CP13 Low Carbon Development	JP-S2 and JP-S3
CP14 Waste	JP-S7
CP15 Minerals	JP-S2 and JP-S7